## THE PARK LAW GROUP, LLC

Attorneys for Plaintiff The Dong-A Ilbo Chull S. Park, Esq. (No. 202681) Hyun Suk Choi, Esq. (No. 203535) 23 S. Warren Street 2<sup>nd</sup> Floor Trenton, New Jersey 08608

# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

## THE DONG-A ILBO,

Dong-A Media Center 139 Sejong Ro, Jongno Gu, Seoul, 110-715, South Korea

Plaintiff,

v.

BO H. LIM a/k/a BO HYUN LIM a/k/a DAVID LIM a/k/a LIM BO a/k/a BO LIM a/k/a BO HI LIM a/k/a BO HYEON LIM, 611 River Road Yardley, Pennsylvania 19067-1906,

#### **AND**

KOOK JIN LEE a/k/a KUK JIN LEE a/k/a KOOK J. LEE a/k/a KOOKJIN LEE a/k/a KOOK J. LEE a/k/a KOOK J. LEE a/k/a KOOK LEE a/k/a KOOK JUN LEE a/k/a PETER LEE, 5330 Twillingate Place Duluth, Georgia 30097-6436,

#### **AND**

THE KOREAN DAILY TRIBUNE, INC. a/k/a KOREAN DAILY TRIBUNE, INC. a/k/a DONG-A DAILY NEWS, PHILADELPHIA, INC. a/k/a DONG-A DAILY NEWS d/b/a THE CHOSUN DAILY PHILADELPHIA d/b/a THE DONG-A DAILY NEWS d/b/a DONG-A

Civil Action No. 08-cv-02399 (GP)

#### **ECF CASE**

CERTIFICATION OF
CHULL S. PARK, ESQ.
IN SUPPORT OF PLAINTIFF'S
APPLICATION FOR CLERK'S
CERTIFICATE OF DEFAULT
AGAINST
DEFENDANT BO H. LIM a/k/a BO
HYUN LIM a/k/a DAVID LIM a/k/a
LIM BO a/k/a BO LIM a/k/a BO HI
LIM a/k/a BO HYEON LIM

## DAILY NEWS, INC.,

1330 Willow Avenue Elkins Park, Pennsylvania 19027,

#### **AND**

THE KOREAN SOUTHEAST NEWS, INC. a/k/a KOREA SOUTHEAST NEWS a/k/a THE SOUTHEAST NEWS, INC. d/b/a DONGA DAILY NEWS, LLC d/b/a THE CHOSUN DAILY NEWS-ATLANTA, jointly and severally, 2730 N. Berkeley Lake Road, #800 Duluth, Georgia 30096, with a branch office located at 1330 Willow Avenue Elkins Park, Pennsylvania 19027

Defendants.

## Chull S. Park hereby certifies that:

- 1. I am a member of the Bar of this Court and am a member of The Park Law Group, LLC, attorneys for Plaintiff The Dong-A Ilbo ("Plaintiff") in this action.
  - 2. I am familiar with all the facts and circumstances in this action.
- 3. I make this Certificate pursuant to Rule 55(a) of Federal Rules of Civil Procedure and in support of Plaintiff's application for Clerk's Certificate of Default against Defendant Bo H. Lim a/k/a Bo Hyun Lim a/k/a David Lim a/k/a Lim Bo a/k/a Bo Lim a/k/a Bo Hi Lim a/k/a Bo Hyeon Lim ("Defendant").
- 4. On May 22, 2008, Plaintiff commenced this action by filing a summons and complaint against four defendants in this action.
- 5. On June 2, 2008, Plaintiff personally served Defendant with a copy of the summons and complaint.

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6. On June 23, 2008, Plaintiff filed proof of such service. A true and correct copy of an Affidavit of Service as to Defendant is attached as Exhibit A.

7. As of June 24, 2008, Defendant has failed to timely plead or otherwise defend this action.

8. A proposed form of Clerk's Certificate of Default against Defendant is attached as Exhibit B.

9. I hereby request the entry of default against Defendant.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 30, 2008

Chull S. Park, Esq. (No. 202681) **THE PARK LAW GROUP, LLC**Attorneys for Plaintiff The Dong-A Ilbo